



Fairfield Trust

Staff and Volunteer Privacy Policy

Fairfield Trust takes data privacy seriously. We recognise and value the trust that individuals place in us when providing us with personal data and we are committed to safeguarding the privacy and security of personal data we may collect from staff and volunteers.

1. **What is this document and why should you read it?**

- 1.1 This privacy notice explains how and why Fairfield Trust (also referred to in this notice as “**we**”, “**our**” and “**us**”) uses personal data about applicants, employees and volunteers (referred to as “**you**”).
- 1.2 You should read this notice, so you know what we are doing with your personal data. Please also read any other privacy notices that we give you, that might apply to our use of your personal data in specific circumstances in the future.
- 1.3 This notice does not form part of your contract of employment or any other contract between us and you.

2. **Fairfield Trust’s data protection responsibilities**

- 2.1 “**Personal data**” is any information that relates to an identifiable natural person. Your name, address, contact details, salary details and CV are all examples of your personal data, if they identify you.
- 2.2 The term “**process**” means any activity relating to personal data, including, by way of example, collection, storage, use, consultation and transmission.
- 2.3 Fairfield Trust is a “**controller**” of your personal data. This is a legal term – it means that we make decisions about how and why we process your personal data and, because of this, we are responsible for making sure it is used in accordance with data protection laws.
- 2.4 You also have responsibilities whenever you process personal data in connection with the performance of your role at Fairfield Trust; these are outlined in our Data Protection Policy.

3. **What types of personal data do we collect and where do we get it from?**

- 3.1 We collect many different types of personal data about you for lots of reasons (which are described in **section 3.4** below).
- 3.2 You provide us with personal data when you apply for a job or volunteer with us, when you complete any forms, surveys or questionnaires we give you or correspond with us and in the course of performing your job. We also obtain some personal data from other sources and create some personal data ourselves.
- 3.3 Further details of the personal data we collect and where we get it from are set out at [Schedule 1](#).
- 3.4 As you can see from the table at [Schedule 1](#), we collect your personal information from you directly and sometimes we obtain it from other people and organisations, including your emergency contacts, your use of Fairfield Trust provided assets, systems and platforms, your line manager and co-workers, your dependants and beneficiaries.].
- 3.5 If any of the personal information you have given to us changes, such as your contact details, please inform us without delay by contacting Vicky Dunncliffe CEO.

- 3.6 We cannot administer our employment or other relationship with you without your personal data. Where we don't need your personal data, we will make this clear, for instance we will explain if any data fields in our application or staff survey processes are optional and can be left blank.
4. **What do we do with your personal data, and why?**
- 4.1 We process your personal data for particular purposes in connection with your employment or other engagement with us and the management and administration of our business.
- 4.2 We are required by law to always have a "lawful basis" (i.e. a reason or justification) for processing your personal data. There are **six** lawful bases for processing – they are set out in the law, and they are where:
- 4.2.1 the individual has given his or her consent to the processing;
 - 4.2.2 the processing of the individual's personal data is necessary to perform a contract with that individual or to take steps at the request of the individual before entering into a contract;
 - 4.2.3 the processing is necessary to comply with a legal obligation to which we are subject;
 - 4.2.4 the processing is necessary in order to protect the vital interests of an individual;
 - 4.2.5 the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us; and
 - 4.2.6 the processing is necessary for our legitimate interests, provided those interests are not overridden by the individual's interests, rights or freedoms.
- 4.3 The table at [Schedule 2](#) sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.
- 4.4 If you would like more information on any of the purposes for which we process your personal data, please contact Vicky Dunncliffe at vicky.dunncliffe@ffc.ac.uk.
- 4.5 Please note that:
- 4.5.1 where our processing is based on your consent, **you can withdraw your consent** at any time. If you do this, it won't impact any processing we've done prior to that date.
 - 4.5.2 where we process your personal data because it is necessary for our legitimate interests, **you can object** to our processing at any time. If you object, we will stop processing unless we can show you a compelling reason why the processing overrides your privacy rights or where the processing is for the establishment, exercise or defence of any potential legal claims.
- 4.6 In addition, where we have indicated in [Schedule 2](#) that our processing of your personal data is either:
- 4.6.1 necessary for us to comply with a legal obligation; or
 - 4.6.2 necessary for us to take steps, at your request, to potentially enter into an employment or other contract with you, or to perform it,
- and you choose not to provide the relevant personal data to us, we may not be able to enter into or continue our contract of employment or engagement with you.
- 4.7 **Automated decision-making**
- 4.7.1 Sometimes, we use your personal data for automated decision making (in other words, decision-making **solely** by automated means without any human involvement), including 'profiling' (automated processing to evaluate certain things about an individual). For example, we may:

- 4.7.1.1 automatically collect, collate and report feedback on your performance from your colleagues, as part of our regular yearly review processes.
- 4.7.1.2 Individual vulnerability factors from Risk Assessments EG, relating to Covid absences.
- 4.7.2 If any of our automated decision-making has legal or other significant effects on you, we will only make those decisions if:
 - 4.7.2.1 it is necessary for us to enter into or perform a contract with you; or
 - 4.7.2.2 it is authorised by applicable law; or
 - 4.7.2.3 we have your explicit consent.

Sensitive personal data (including criminal data)

We are required by law to treat certain categories of personal data with even more care than usual. These are called special categories of personal data – and in this notice, we refer to them as “**sensitive personal data**”. For these categories of personal data, different lawful bases apply. The table at [Schedule 3](#) sets out the different purposes for which we process your sensitive personal data and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one legal basis may be relevant – depending on the circumstances.

5. Who do we share your personal data with, and why?

- 5.1 Sometimes we need to disclose your personal data to other people.
- 5.2 From time to time, we may ask third parties to carry out certain business functions for us, such as the administration of our payroll and our IT support. These third parties will process your personal data on our behalf (as our processor). We will disclose your personal data to these parties so that they can perform those functions. Before we disclose your personal data to other people, we will make sure that they have appropriate security standards in place to make sure your personal data is protected and we will enter into a written contract imposing appropriate security standards on them. Examples of these third-party service providers include service providers and/or sub-contractors, include our IT systems software and maintenance, back up, and server hosting providers.
- 5.3 In certain circumstances, we will also disclose your personal data to third parties who will receive it as controllers of your personal data in their own right for the purposes set out above, in particular:
 - 5.3.1 if we transfer, purchase, reorganise, merge or sell any part of our business or the business of a third party, and we disclose or transfer your personal data to the prospective seller, buyer or other third party involved in a business transfer, reorganisation or merger arrangement (and their advisors); and
 - 5.3.2 if we need to disclose your personal data in order to comply with a legal obligation, to enforce a contract or to protect the rights, property or safety of our employees, customers or others.
- 5.4 We have set out below a list of the categories of recipients with whom we are likely to share your personal data:
 - 5.4.1 employment-related benefits providers and other third parties in connection with your benefits (such as pension trustees);
 - 5.4.2 Software contractors EG HR MIS systems, Care management systems (Care Control) and training portal providers (Quintil, NACAS)
 - 5.4.3 insurers; and
 - 5.4.4 governmental departments, statutory and regulatory bodies including the Department for Work & Pensions, Information Commissioner’s Office, the police and Her Majesty’s Revenue and Customs.

6. **How do we keep your personal data secure?**

We will take specific steps (as required by applicable data protection laws) to protect your personal data from unlawful or unauthorised processing and accidental loss, destruction or damage. For more information, you can contact Vicky Dunncliffe CEO at vicky.dunncliffe@ffc.ac.uk.

How long do we keep your personal data for?

- 6.1 If you are our employee we will keep your personal data during the period of your employment and then, after your employment with us ends, for as long as is necessary in connection with both our and your legal rights and obligations. This may mean that we keep some types of personal data for longer than others.
- 6.2 We will only retain your personal data for a limited period of time. This will depend on a number of factors, including:
- 6.2.1 any laws or regulations that we are required to follow;
 - 6.2.2 the existence of a legal or other type of dispute to which your Personal Information may be relevant;
 - 6.2.3 the type of information that we hold about you; and
 - 6.2.4 whether we are asked by you or a regulatory authority to keep your personal data for a valid reason.
- 6.3 Please note that any personal data contained in any work-related correspondence or records may be retained for longer, dependant on the retention period of correspondence or records that your personal data is held on.

7. **What are your rights in relation to your personal data and how can you exercise them?**

- 7.1 You may have certain legal rights in relation to your personal data which we hold.
- 7.2 Where our processing of your personal data is based on your **consent** (see [Schedule 4](#)), you have the right to withdraw your consent at any time. If you do decide to withdraw your consent we will stop processing your personal data for that purpose, unless there is another lawful basis we can rely on – in which case, we will let you know. Your withdrawal of your consent won't impact any of our processing up to that point.
- 7.3 Where our processing of your personal data is necessary for our **legitimate interests** (see [Schedule 4](#)), you can object to this processing at any time. If you do this, we will need to show either a compelling reason why our processing should continue, which overrides your interests, rights and freedoms or that the processing is necessary for us to establish, exercise or defend a legal claim.
- 7.4 If you wish to exercise any of these rights please contact Vicky Dunncliffe CEO at vicky.dunncliffe@ffc.ac.uk in the first instance.
- 7.5 You also have the right to lodge a complaint with the Information Commissioner's Office – for contact details click [here](#).

8. **Updates to this notice**

We may update this notice from time to time to reflect changes to the type of personal data that we process and/or the way in which it is processed. We will update you on material changes to this notice. We also encourage you to check this notice on a regular basis.

9. **Where can you find out more?**

If you have any queries about how Fairfield Trust process your personal data, please contact Vicky Dunncliffe at vicky.dunncliffe@ffc.ac.uk.

Schedule 1

Categories of personal data

The table below sets out details of the personal data we collect and where we get it from. As you can see, we collect your personal information from you directly and sometimes we obtain it from other people and organisations, including some public sources, your emergency contacts, your use of Fairfield Trust provided assets, systems and platforms, your line manager and co-workers, your dependants and beneficiaries, third party benefits providers.

Type of personal data	Collected from
a) Contact Information	
- Name(s) - Address(es) - Email address(es) - Contact details including mobile telephone number(s)	You
b) Personal Information	
- Date of birth - Gender - Next of kin or other dependants - Marital or relationship status - Lifestyle and social circumstances - Emergency contact information	You
c) Identity and Background Information	
- Details of education and qualifications and results - Career history, experience and skills - LinkedIn - Passport information - Driving licence information - Right to work, residency and/or other visa information (where unrelated to your race or ethnicity) - Curriculum Vitae (CV) or resume - Image or photographs - Application Form and Equal Opportunities Monitoring Form - Evaluative notes and decisions from job interviews - Preferences relating to job location and salary - Criminal record information (DBS) - Suitability to work with children and vulnerable young people - Social Media checks	- You - Recruitment consultants and agencies - Your previous employers - Publicly available information from online resources including social media platforms - Governmental departments such as tax offices - Disclosure and Barring Service
d) Financial Information	
- Bank account details - Salary, compensation and other remuneration information - National insurance number and/or other governmental identification numbers - Tax codes - Business expense and reimbursement details	- You - Your previous employer

Type of personal data	Collected from
e) Sensitive Personal Data (see section 0 for further information)	
• Racial or ethnic origin (including your nationality and visa information) • Political opinions • Religious or philosophical beliefs • Trade union membership • Biometric data (including fingerprint and retinal scans) • Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long-term absence) • Sexual orientation • Health and safety and accident records and reports • Information relating to actual or suspected criminal convictions and offences	• You • Your emergency contact(s) • Your use of Fairfield Trust security control systems
f) Employment Administration Information	
• Terms and conditions of employment • Work related contact details (including location and office and corporate phone numbers) • Image / photographs (circulated internally via staff electronic noticeboard when employment starts) • Holiday and other leave related records • Your working preferences and feedback in relation to Fairfield Farm Trust and our staff • Your preferences in relation to our use of your personal data • Hours worked and working time preferences • Statutory and non-statutory leave and absence records • Job termination details	• You
g) Job Performance Information	
• Role responsibilities • Personal development reviews and appraisals, and associated feedback • Training records • Attendance information, including assignments and timesheets • Promotion application and/or outcome records • Transfer information	• You • Your line manager(s) and co-workers • Training providers • Company to which transferred or seconded
h) Investigation, Grievance and Disciplinary	
• Fairfield Farm Trust investigations records • Grievance and disciplinary records • Employment tribunal records	• You • Your line manager(s) and co-workers • Third parties, as permitted by applicable law
i) Travel and Expenses Information	
• Transaction records • Visa, passport and insurance details • Flight and accommodation booking information • Travel itinerary information	• You • Your use of Fairfield Trust payment / credit cards

Type of personal data	Collected from
j) Benefits Information	
- pensions memberships for you and/or your dependants or other beneficiaries - Death benefit information	- You - Third party benefits providers - Your dependants or other beneficiaries
k) Asset, Systems and Platform Usage and Communications Information	
- Computer and phone records - Access logs and usage records from document management systems and other Fairfield Farm Trust provided applications and technologies - User IDs and password information - IP addresses and device identifiers - Records of calls, messages and/or internet or other data traffic and communications	- You - Your use of Fairfield Trust assets, systems and platforms
l) Security, Location and Access Information	
Information (including image and biometric data) captured or recorded by electronic card access systems, CCTV and other security control systems	- You - Your use of Fairfield Trust security control systems

Schedule 2

Purposes for processing personal data

The table below sets out the different purposes for which we process your personal data and the relevant lawful basis on which we rely for that processing.

For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Where our processing is necessary for our legitimate interests, those interests are the purposes listed below.

	Purposes of processing	Lawful basis We are permitted to process your personal data because...				
		1. You have given your consent to the processing (Please also see section 7.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties (Please also see section 7.3)	5. It is necessary to protect your vital interests (or those of someone else)
a)	New joiner activities					
1.	Making a job offer to you and entering into a contract of employment with you		✓			
2.	Reviewing and confirming your right to work in the UK			✓		
3.	Conducting verification and vetting, including criminal background checks and credit checks where required by law (Note: may involve sensitive personal data, see also section 0)			✓		
4.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role (Note: may involve sensitive personal data, see also section 0)	✓		✓		
b)	General employment management and administration					
5.	Communicating with you and providing you with information in connection with your employment or engagement with us from time to time		✓		✓	✓
6.	Paying your salary, compensation and any other benefits pursuant to your contract of employment		✓			
7.	Calculating and administering taxation within payroll, and your entitlements to any statutory / contractual benefits (including statutory sick pay and workforce pension arrangements)			✓		
8.	Facilitating the administration of any private healthcare, life assurance/insurance, pensions			✓	✓	

	Purposes of processing	Lawful basis We are permitted to process your personal data because...				
		1. You have given your consent to the processing (Please also see section 7.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties (Please also see section 7.3)	5. It is necessary to protect your vital interests (or those of someone else)
	initiatives and plans that we offer in connection with your employment with us (Note: may involve sensitive personal data, see also section 0)					
9.	General staff administration, including workforce management and facilities operations				✓	
10.	Managing our health and safety compliance obligations			✓		
11.	Paying you discretionary or non-contractual benefits or compensation if applicable				✓	
12.	Managing annual leave entitlement and records, and to administer related payments				✓	
13.	Managing absence records, contractual sick leave entitlement and administering related payments (Note: may involve sensitive personal data, see also section 0)		✓		✓	
14.	Managing maternity, paternity, adoption, parental and dependants leave and (where applicable) pay			✓		
15.	Contacting the appropriate person in the event of an emergency concerning you (Note: may involve sensitive personal data, see also section 0)					✓
16.	Administering our insurance policies (Note: may involve sensitive personal data, see also section 0)				✓	
17.	Determining whether any adjustments are necessary to enable you to carry out your role (Note: may involve sensitive personal data, see also section 0)		✓	✓		
18.	Preparing risk assessments to prevent future injuries in the workplace			✓		
19.	Administering your travel and accommodation arrangements		✓	✓	✓	
20.	Carrying out performance reviews				✓	
21.	Allocating and assigning responsibilities as necessary for workload management purposes, and measuring staff utilisation				✓	
22.	Administering, recording and analysing training and training records				✓	

	Purposes of processing	Lawful basis				
		We are permitted to process your personal data because...				
		1. You have given your consent to the processing (Please also see section 7.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties (Please also see section 7.3)	5. It is necessary to protect your vital interests (or those of someone else)
23.	Supporting the establishment and maintenance of online and offline staff directories				✓	
24.	Considering your continuous suitability for your role				✓	
25.	Providing details of your employment to a new or potential employer, bank or financial institution where requested by you	✓				
26.	Handling capability, complaint, grievance and disciplinary matters, including investigating issues, considering appropriate resolution and mitigating actions and reviewing outcomes. This may include recording meetings using AI technology. Your consent will always be sought prior to any recording. Meetings will not be recorded without your consent and a transcript or summary shall be provided.	✓			✓	
27.	Arranging and facilitating inter-office and client secondments				✓	
28.	Responding to reference requests from your future potential employers				✓	
29.	Managing our leaver systems and processes (when someone leaves Fairfield Farm Trust)					
c)	Security and governance					
30.	Monitoring the security of Fairfield Farm Trust's physical premises and systems, networks and applications			✓	✓	
31.	Identifying and authenticating employees and other individuals (Note: may involve sensitive personal data)				✓	
32.	Establishing a network of emergency contacts for individuals in case of emergency				✓	
33.	Identifying, investigating and mitigating suspected misuse of Fairfield Farm Trust's assets, systems and platforms (Note: may involve sensitive personal data)			✓	✓	
34.	Ensuring compliance with Fairfield Farm Trust policies and procedures (Note: may involve sensitive personal data)				✓	

	Purposes of processing	Lawful basis We are permitted to process your personal data because...				
		1. You have given your consent to the processing (Please also see section 7.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties (Please also see section 7.3)	5. It is necessary to protect your vital interests (or those of someone else)
d)	Legal and regulatory compliance and responsibilities					
35.	Managing and administering our equal opportunities reporting (Note: may involve sensitive personal data)			✓		
36.	Compliance with obligations under the contract of employment between you and Fairfield Farm Trust		✓			
37.	Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities (Note: may involve sensitive personal data)			✓		
38.	Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities				✓	
39.	Complying with disclosure orders arising in civil proceedings (Note: may involve sensitive personal data)			✓		
40.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Fairfield Farm Trust's compliance with relevant legal and regulatory requirements (Note: may involve sensitive personal data)			✓		
41.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting Fairfield Farm Trust's compliance with best practice and good governance responsibilities				✓	
42.	Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes (Note: may involve sensitive personal data)			✓	✓	
e)	Fairfield Farm Trust business operations					
43.	Managing our day-to-day operations in relation the provision of educational services				✓	

	Purposes of processing	Lawful basis We are permitted to process your personal data because...				
		1. You have given your consent to the processing (Please also see section 7.2)	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties (Please also see section 7.3)	5. It is necessary to protect your vital interests (or those of someone else)
44.	Implementing, adapting and enhancing systems and processes to develop or improve our business and/or make your job easier or more enjoyable				✓	
45.	Managing, planning and delivering events, projects and initiatives				✓	
46.	Supporting our diversity programmes and staff support networks and initiatives (Note: may involve sensitive personal data)	✓				
47.	Publishing external facing materials for marketing and public relations purposes such as where we mention you in the context of Fairfield Farm Trust projects and initiatives in our marketing materials, social media posts and press releases				✓	
48.	Supporting, updating and maintaining our technology infrastructure		✓		✓	
49.	Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of another business			✓	✓	
50.	Identifying and assessing Fairfield Farm Trust's strategic business direction and resourcing needs, current employees and areas for development and making operational changes to address these matters				✓	
51.	Analysing recruitment and HR-related objectives and results (for example, staff retention and turnover rates)				✓	
52.	Collecting feedback in relation to our recruitment and HR activities and processes for continuous improvement purposes				✓	

Schedule 3

Purposes for processing sensitive personal data

The table below sets out the different purposes for which we process your sensitive personal data and the relevant lawful basis on which we rely for that processing. For some processing activities, we consider that more than one legal basis may be relevant – depending on the circumstances.

	Purposes of processing	Sensitive data lawful basis We are permitted to process your personal data because...					
		1.You have given your explicit consent to the processing	2.It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	3.It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	4.It is necessary for our establishment , exercise or defence of legal claims	5.It is necessary for reasons of substantial public interest	6.It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
a) New joiner activities							
1.	Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓	
2.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓				✓	
b) General employment management and administration							
3.	Facilitating the administration of any pensions initiatives and plans that we offer in connection with your employment with us		✓			✓	
4.	Managing absence records, contractual sick leave entitlement and administering related payments		✓			✓	
5.	Contacting the appropriate person in the event of an emergency concerning you			✓			
6.	Administering our insurance policies					✓	
7.	Determining whether any adjustments are necessary to enable you to carry out your role		✓				
c) Security and governance							
8.	Identifying and authenticating employees and other individuals	✓					

	Purposes of processing	Sensitive data lawful basis We are permitted to process your personal data because...					6. It is necessary for preventive or occupational medicine , for the assessment of the working capacity of the employee
		1. You have given your explicit consent to the processing	2. It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	3. It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment, exercise or defence of legal claims	5. It is necessary for reasons of substantial public interest	
9.	Identifying, investigating and mitigating suspected misuse of Fairfield Farm Trust's assets, systems and platforms				✓		
d) Legal and regulatory compliance and responsibilities							
10.	Managing and administering our equal opportunities reporting					✓	
11.	Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same				✓		
12.	Complying with disclosure orders arising in civil proceedings				✓		
13.	Investigating, evaluating, demonstrating, monitoring, improving and reporting Fairfield Farm Trust's compliance with relevant legal and regulatory requirements				✓		
14.	Responding to employment and industrial relations matters where permitted by applicable law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes				✓		
e) Day-to-day business operations							
15.	Supporting our diversity programmes and staff support networks and initiatives	✓					

Schedule 4

Individuals' rights

Your right	What does it mean?	Limitations and conditions of your right
Right of access	Subject to certain conditions, you are entitled to have access to your personal data (this is more commonly known as submitting a "data subject access request").	If possible, you should specify the type of information you would like to see to ensure that our disclosure is meeting your expectations. We must be able to verify your identity. Your request may not impact the rights and freedoms of other people, e.g. privacy and confidentiality rights of other staff.
Right to data portability	Subject to certain conditions, you are entitled to receive the personal data which you have provided to us and which is processed by us by automated means, in a structured, commonly-used machine readable format.	If you exercise this right, you should specify the type of information you would like to receive (and where we should send it) where possible to ensure that our disclosure is meeting your expectations. This right only applies if the processing is based on your consent or on our contract with you and when the processing is carried out by automated means (i.e. not for paper records). It covers only the personal data that has been provided to us by you.
Rights in relation to inaccurate personal or incomplete data	You may challenge the accuracy or completeness of your personal data and have it corrected or completed, as applicable. You have a responsibility to help us to keep your personal information accurate and up to date. We encourage you to notify us of any changes regarding your personal data as soon as they occur, including changes to your contact details, telephone number, immigration status.	Please always check first whether there are any available self-help tools to correct the personal data we process about you. This right only applies to your own personal data. When exercising this right, please be as specific as possible.
Right to object to or restrict our data processing	Subject to certain conditions, you have the right to object to or ask us to restrict the processing of your personal data.	As stated above, this right applies where our processing of your personal data is necessary for our legitimate interests. You can also object to our processing of your personal data for direct marketing purposes.
Right to erasure	Subject to certain conditions, you are entitled to have your personal data erased (also known as the " <i>right to be forgotten</i> "), e.g. where your personal data is no longer needed for the purposes it was collected for, or where the relevant processing is unlawful.	We may not be in a position to erase your personal data, if for example, we need it to (i) comply with a legal obligation, or (ii) exercise or defend legal claims.
Right to withdrawal of consent	As stated above, where our processing of your personal data is based on your consent you have the right to withdraw your consent at any time.	If you withdraw your consent, this will only take effect for future processing.